File

Jump, Christine

From: Jump, Christine
Sent: Wednesday, October 22, 2014 4:21 PM
To: 'Michael Stephenson'
Cc: SMITH, MARTIN L; Brady Gerber; sklaus@geostatenvironmental.com; Akhter Hossain; Lininger, Don
Subject: RE: NE Corner and East of Building J Results and figure

Marty and Mike-

I have a number of significant concerns about this submittal.

1) According to the information submitted, confirmation sample location NE1-SW1-2.5' significantly exceeded the IAO for PCE and lead, but no additional excavation was conducted in this area due to fiber optic infrastructure. At a minimum additional samples should have been collected to delineate the impacts.

2) Boring B-63, located in this area contained significantly elevated concentrations of PCE at 11' BLS, but excavation was only conducted to 10' BLS.

   EPA noted in comment 5 of the 7-31-14 Letter Approval with Modifications that the depth of soil impacts on the work plan figure underestimated the depth of soil impacts because it did not project excavation below the deepest detections above IAOs. EPA did not require a revised figure, but did state that these depths must be taken into consideration when implementing the IRM work plan. This was not done in the vicinity of B-63.

3) A confirmation sample represents an area between each confirmation sample. When a confirmation sample exceeds the IAO, the entire area represented by that sample must be assumed to exceed the IAO and must be excavated and/or have additional confirmation samples collected to bracket the exceedence. The fact that the NE corner, represented by confirmation sample NE4-SW1 2.5' and the SE corner, represented by confirmation sample NE1-SW1-2.5' both significantly exceeded the IAO means that the entire east side of that excavation must be considered to exceed the IAO. Therefore, additional excavation and additional sampling at shorter lateral intervals should have been conducted to confirm that the impacted soil was addressed. Additional sampling should also have been conducted on the opposite side of the excavation where confirmation sample NE3-SW4-2.5' exceeded the IAO.

4) Clean Harbors should have contacted EPA before assuming that the elevated chromium could be attributed to " broken glass" and no further action was necessary. This is not in compliance with the work plan and this determination is not approved by EPA.

5) The EPA comment letter on the Draft RCRA Soil IRM Work Plan dated 04/09/14 requested in comment number 14, that draft confirmation samples and locations be submitted to the regulatory agencies for feedback prior to restoration (but recognized that under certain situations such as when the excavation endangered a building wall, that would not be possible.) This excavation was backfilled prior to EPA receiving the data and EPA is not aware of any extenuating circumstances requiring backfilling. Based on the reasons documented above, additional sampling will be required.

Please give me a call so we can discuss these issues further with regard to the ongoing activities at the site.

Thank you.

Chris Jump, L.G.
Waste Remediation and Permitting Branch

RCRA

533623

US EPA, Region 7
jump.chris@epa.gov
(913) 551-7141

Mailing address: 11201 Renner Boulevard, Lenexa, KS 66219

From: Michael Stephenson [mailto:mstephenson@cameron-cole.com]
Sent: Wednesday, October 22, 2014 1:24 PM
To: Jump, Christine
Cc: SMITH, MARTIN L; Brady Gerber; sklaus@geostatenvironmental.com
Subject: NE Corner and East of Building J Results and figure

Hello Chris,

Attached please find tabulated data for the confirmation soil sampling data collected from the northeastern corner excavation and the east of building J excavation. The dimensions of each excavation are depicted on the attached figure.

Northeastern Corner:

There were four samples with IAO exceedances at the planned dig perimeter. Three samples originally exceeded for PCE. Two of these results (NE4-SW1-2.5 and NE5-SW1-7.5) drove an additional 2 feet of excavation followed by a resample (NE4-SW1A-2.5', NE5-SW1A-7.5') both of which were below IAOs. The third location (NE1-SW1) could not be further excavated due to the presence of subsurface fiber optic infrastructure.

One sidewall sample (NE3-SW4-2.5')exceeded the IAO for chromium at the original dig dimension. An additional 2 feet was excavated and the sidewall was resampled (NE3-SW4A-2.5') resulting in another exceedance. There was a large amount of broken glass mixed with the soil at this location and it is believed that the chromium concentrations may be from the colored glass. No additional excavation was performed in this area.

East of Building J.

All results were below IAOs.

Both excavations have been backfilled at this time.

IF you have any questions or concerns, please call me.

Thanks,

Mike Stephenson
Principal Scientist
Cameron-Cole, LLC
50 Hegenberger Loop
Oakland CA 94621
office - 510.777.1864
mobile - 510.773.9895
mstephenson@cameron-cole.com